

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

NICOLE FREEMAN, as wrongful death)
Representative of Gershun Freeman)
and next friend of minor child T.F.,)
PLAINTIFF)
v.) Civil Action No.
) 2:23-cv-02193-MSN-tmp
)
SHERIFF FLOYD BONNER, Jr., in his)
Individual capacity; CHIEF JAILER KIRK)
FIELDS, in his individual capacity; and the)
GOVERNMENT OF SHELBY COUNTY,)
TENNESSEE,)
DEFENDANTS.)

THE WADE LAW FIRM'S NOTICE OF OBJECTION
TO PLAINTIFFS' SUBPOENA FOR PRODUCTION OF DOCUMENTARY
EVIDENCE
PURUSANT TO FED. R. CIV. P. 45(d)(2)(B)

COMES NOW The Wade Law Firm, PLLC (hereinafter referred to as the "Wade Firm"), by and through undersigned counsel, to give notice of the service of a written objection pursuant to Fed. R. Civ. P. 45(d)(2)(B) on Jacob Webster Brown, attorney for Plaintiff, to the Subpoena for Production of Documentary Evidence issued by Plaintiff, Nicole Freeman (referred to herein as the "Plaintiff") and served on Allan Wade, an attorney with the Wade Firm on July 1, 2024.

Date of Service: July 15, 2024
Method of Service: Hand Delivery

Respectfully submitted,

THE WADE LAW FIRM, PLLC

/s/ Allan J. Wade

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Attorneys for Defendant Sheriff Bonner

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document has been served on all counsel of record in this case by electronic means on this the 15th day of July 2024.

/s/ Allan J. Wade